



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 10 HANFORD PROJECT OFFICE
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January 10, 2000

Bob McLeod
 300 Area Project Manager
 U.S. Department of Energy
 Richland Operations Office
 P.O. Box 550, H0-12
 Richland, WA 99352

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EDMC

Re: Initial EPA comments on "Draft A of the 300 FF-2 Operable Unit Focused Feasibility Study (DOE/RL-99-40) and Proposed Plan (DOE/RL-99-53)"

Dear Mr. McLeod:


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 52128

EPA's Hanford Project Office has conducted an initial review of "Draft A of the 300 FF-2 Operable Unit Focused Feasibility Study (DOE/RL-99-40) and Proposed Plan (DOE/RL-99-53)," hereafter referred to as the draft FFS and Proposed Plan. Both documents were submitted to complete the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone (M-15-23B) for initiation of regulator review of these two documents by November 30, 1999.

While technically achieving this milestone, both documents still require a significant amount of work before they will be considered acceptable for formal public comment and review under the CERCLA remedy selection process. As they are currently written, the documents are not clear on what specific proposals the Department of Energy is soliciting public comment. We will continue to work with you and your staff to ensure that this is achieved and furthermore, that the proposals are supported by the technical documentation prior to the initiation of the public comment period.

Enclosed is an initial set of "big picture" comments for DOE to start working on. They reflect a consensus amongst the regulators (EPA and Ecology) for what issues will need to be addressed prior to release of the documents for public comment and review. These comments are being submitted within the 45 calendar-day review period established in the Tri-Party Agreement for these documents. As you are aware, we are also currently proceeding through an internal review process with the EPA National Remedy Review Board, and anticipate sending additional comments after that review has been completed and feedback received. The review is scheduled to take place on January 12, 2000, and we expect to receive comments one month later. So additional comments will likely be submitted in February as well.

We will continue to work with your staff to address these issues in the most efficient and effective manner. If you have any questions regarding these comments, please contact me at 376-4919.

A handwritten signature in black ink, appearing to read "Mike Goldstein", with a long horizontal flourish extending to the right.

Mike Goldstein
300 Area Project Manager

Enclosure

cc: John April, BHI
Beth Bilson, DOE
Russell Jim, YN
Nanci Peters, YN
Pat Sobotta, NPT
Alex Stone, Ecology
J. R. Wilkinson, CTUIR
Administration Record (300-FF-2 Operable Unit)

Issues to be addressed Prior to Release of Focused Feasibility Study (FFS)
and Proposed Plan for Public Comment

1) Consistency with cleanup strategy and rationale described in December 8, 1999 EPA National Remedy Review Board Briefing Package

Both documents will need to be revised to reflect changes that have been made to the cleanup strategy and rationale as described in the December 8, 1999 EPA National Remedy Review Board Briefing Package. In particular, the decision to integrate the burial grounds containing transuranic (TRU) wastes (i.e., 618-10 and 618-11) into the CERCLA decision-making process needs to be reflected in the revised FFS and Proposed Plan. (NOTE: Preferred Alternative of RTD has not changed as a result of this integration.)

2) Identification of soil cleanup levels that achieve Remedial Action Objectives (RAOs)

The draft documents do not currently contain a proposed approach for achieving remedial action objectives (i.e., soil cleanup levels have not been identified). If specific lookup values are not available due to the lack of site-specific information (e.g., soil cleanup levels for radionuclides that will achieve the 15 millirem cleanup standard), then a specific approach for determining these cleanup levels needs to be identified (i.e., describe the specific steps that will be followed in the RD/RA workplan process). For non-radionuclides, contaminant-specific cleanup levels must be identified or a site-specific risk-based approach must be identified. All cleanup levels must meet the RAOs of protection of human and ecological receptors and protection of water quality in ground waters and surface waters.

3) Explanation of Conceptual Site Model

A number of specific questions have been raised due to the manner in which the conceptual site model is described in both documents. The explanation needs to be clarified. In addition, appropriate modifications may need to be made to portions of the documents which are based on the conceptual site model (e.g., discussion of baseline risks, basis for cleanup levels or risk-based approaches for achieving them, how proposed cleanup approaches will address pathways identified in conceptual site model, etc...).

4) Explanation of Remedial Alternatives and Preferred Alternatives

A number of changes have been made in the December 8, 1999 EPA National Remedy Review Board Briefing Package that have an impact on how the cleanup strategy and rationale is described in the FFS and Proposed Plan. Two major changes include: a) the discussion the cleanup approach and rationale for TRU burial grounds has been integrated into the CERCLA remedy selection process; and b) two additional components have been added to the RTD alternative (institutional controls to maintain restricted industrial land uses and additional monitoring to demonstrate impact/lack of impact on other media from

source materials (e.g., ground water)). These changes will require modification to the appropriate sections of the draft FFS and Proposed Plan.

5) Documentation of cost estimates

Cost estimates were revised and their clarity and transparency improved during the development of the December 8, 1999 EPA National Remedy Review Board Briefing Package. Appropriate edits will be required for the draft FFS and Proposed Plan as a result.

6) Discussion of "contingency remedy" approach for source sites within the 300 area complex in draft FFS and Proposed Plan is inappropriate and must be removed

Both draft documents contain references to a "contingency remedy" approach for remediation of source sites within the 300 area complex. This approach, as it is currently described, is inconsistent with EPA policy on the use of contingency remedies. In order for this to be a contingency remedy, an alternative cleanup approach (e.g., limited action), the specific criteria for invoking this approach (e.g., reasonably anticipated future use as a parking lot), and the specific process that will be employed for the alternative approach (e.g., an ESD) must be identified in the Proposed Plan for the public to comment on. In other words, DOE would be soliciting comments on two specific cleanup approaches and obtaining feedback on BOTH at the same time. In addition, both cleanup approaches must be acceptable under the CERCLA nine-criteria analysis. As it is currently written, DOE is explaining the current process that already exists for modifications to a signed ROD. As such, it adds nothing, but potential confusion, to the document and thus should be removed completely. EPA will note the implementation issues associated with remediating an active industrial complex in the "Description of the Selected Remedy" portion of the 300-FF-2 ROD that will be developed after the public comment period is over.